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April 29, 2021

**VIA ELECTRONIC FILING**

Honorable R. Barclay Surrick  
United States District Judge  
United States Courthouse  
601 Market Street - Room 8614  
Philadelphia, Pennsylvania 19106

Re: Ex Parte Application Of Iraq Telecom Limited For An Order To Obtain Discovery For Use In Foreign Proceedings Pursuant To 28 U.S.C. § 1782 – Miscellaneous No. 19-175

Dear Judge Surrick:

We and our co-counsel represent the applicant, Iraq Telecom Limited (“Iraq Telecom”), in the above-captioned proceeding under 28 U.S.C. §1782. Presently pending for decision is Iraq Telecom’s motion to compel the production of documents claimed to be privileged (“Motion to Compel”) (ECF 20–ECF 21, ECF 23–ECF 24-19, ECF 27–ECF 27-12) by Messrs. Youssef and Succar.

As detailed in that motion (and underlying application (ECF 1-1)), Iraq Telecom seeks this discovery for use in an ongoing International Chamber of Commerce arbitration and contemplated proceedings in the United Kingdom (“Foreign Proceedings”) to further expose and remedy what it believes and alleges is massive fraud and blatant corruption involving the Iraqi telecommunications system. The documents involved on the motion bear directly on the bribery, corruption and collusion of Iraqi officials.

Messrs. Youssef and Succar have also filed a motion for leave to file surreply in opposition to Iraq Telecom’s motion to compel (ECF 28–ECF 28-2), but for the reasons set forth in our opposition (ECF 29), a surreply is not appropriate here.

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While this briefing and other filings are extensive, as previously noted, Iraq Telecom believes that oral argument might simplify the issues in the Motion to Compel and allow for prompt resolution of this matter. Unfortunately, when the motion was filed last November, COVID-19 restrictions and travel issues prevented an in-person argument of the motion.

However, we noted the Court's recent guidelines for the reinstitution of in-person civil jury trials and thought it prudent to advise the Court that counsel for Iraq Telecom are able to travel without issue and stand ready to attend in-person oral argument on the Motion to Compel if the Court would find such an argument beneficial.

We appreciate the Court's assistance in this matter and resolution of the Motion to Compel so that any additional discovery may be meaningfully used in the Foreign Proceedings.

Thank you for your consideration.

Respectfully submitted,

QUINN EMANUEL URQUHART & SULLIVAN, LLP

*/s/ Kristin N. Tahler*

Kristin N. Tahler

cc: All counsel of Record by ECF Filing